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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS PRODUCTS  
LIABILITY LITIGATION

This Document Applies to:

**KIMBERLEY WATKINS**

No. 2:15-MD-02641-PHX-DGC

(AZ Member Case - 2:19-CV-02312)

**NOTICE OF VOLUNTARY  
DISMISSAL OF C.R. BARD, INC.  
WITHOUT PREJUDICE**

Pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiff Kimberley Watkins, gives notice that she dismisses *without prejudice* her complaint as against only Defendant C. R. Bard, Inc. in this civil action. This dismissal does not extend to Plaintiff's claims against Defendant Bard Peripheral Vascular, Inc.

Defendant C. R. Bard, Inc. has not filed an answer or motion for summary judgment; therefore, this Notice is proper under Rule 41(a)(1)(A)(i).

DATED this 10<sup>th</sup> day of September 2019.

**DALIMONTE RUEB STOLLER, LLP**

By: /s/ Paul L. Stoller  
John A. Dalimonte  
Paul L. Stoller  
Ashley Crowell

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on this    day of September 2019 I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Donna M. Berrios